

Exhibit 57

Page 1

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK
3

4 -----x

5 DONNA WOOD, et al, individually
6 and on behalf of all others
7 similarly situated,

8 Plaintiffs,

9 vs. 20 Civ. 2489 (LTS) (GWG)

10 MIKE BLOOMBERG 2020, INC.,

11 Defendant.

12 -----x

13
14 VIDEOTAPE DEPOSITION OF
15 ALEXANDRA WHEATLEY-DIAZ
16 VIA ZOOM VIDEOCONFERENCE

17 November 11, 2022

18 7:16 a.m. PST

19

20

21

22

23

24 Reported by:

25 Maureen Ratto, RPR, CCR

<p style="text-align: right;">Page 54</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 of the conversation you talked about the 3 other people you'd be working with. Tell 4 me what you discussed in that regard? 5 A. I understood that several 6 other of Jamarah's family would be 7 working there, friends, other people that 8 had been working in politics for a long 9 time at higher -- at different levels, 10 not at my level. 11 Q. Why did you decide to take the 12 job? 13 A. There was no real reason, 14 other than I -- I would say that for me I 15 took the job as an opportunity to be 16 exposed to a new experience and be 17 interested in a field that I had never 18 worked in before and support a candidate 19 that I was interested in learning more 20 about. 21 Q. What was it about your 22 background that you thought would make 23 you a good field organizer? 24 MS. COLE-CHU: Objection to 25 form.</p>	<p style="text-align: right;">Page 56</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 that I was given and the conversations 3 that I personally had with several 4 people, that that was the case but I 5 can't -- I can't know for sure. 6 Q. And now, you referred to a 7 script and the conversations that you 8 had. 9 Give me an example of how you 10 might go about trying to convince 11 somebody that Mike Bloomberg was a 12 candidate that they should support? 13 MS. COLE-CHU: Objection to 14 form. 15 A. It's been a couple of years. 16 I don't have any of the resources that I 17 was allocated at that time to help me 18 prepare a statement or, like, a pitch for 19 that time. So I apologize. 20 Q. Well, to the best of your 21 recollection, sitting here today, walk me 22 through what you would do? 23 A. We were given several 24 different outlets to communicate with 25 potential voters, of which each outlet</p>
<p style="text-align: right;">Page 55</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 A. To my understanding, I don't 3 think that was, like I said, considered. 4 I also, to my understanding, don't think 5 that anything in my background made me 6 more or less qualified for the position. 7 And as I stated before, there was no 8 interview so it was -- to my 9 understanding, it was never really 10 considered at all. 11 Q. Do you think you were a good 12 field organizer? 13 A. Oh, I was a great field 14 organizer. 15 Q. Okay. What was it about you 16 that made you a great field organizer? 17 A. I was passionate about my -- 18 about my job, I'm a hard worker and I 19 take a lot of pride in what I do and how 20 I work. 21 Q. Were you able to persuade 22 people to support Mike Bloomberg who 23 initially were not supporters? 24 A. I can't say for sure. I'd 25 like to believe that based on the script</p>	<p style="text-align: right;">Page 57</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 required different skills or different -- 3 I recall -- I wouldn't say skills, 4 different methods of communication, not 5 skills. So the different methods of 6 communication, some of it was texting, 7 some of it was through an app, some of it 8 was door knocking and most of it was 9 calls. 10 Q. You said that you were 11 passionate. How would you express that 12 passion in conversations with prospective 13 voters? 14 MS. COLE-CHU: Objection to 15 form. 16 A. For me that means that I 17 believe in what I'm saying versus feeling 18 like I'm just reading off of a script and 19 so for me it just came off like I really 20 -- here are some of the things in which 21 it's been brought to my attention this 22 man is trying to do for our community and 23 I would state what those several items 24 were that I was -- that I resonated with, 25 and I would speak openly and candidly</p>

<p style="text-align: right;">Page 90</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 that correct? 3 A. I give a summary of my 4 background, correct, and my work 5 experience. 6 Q. You say, "Strategic 7 communications, versatile professional"-- 8 "professional" would be a reference to 9 you, right? 10 A. Correct. 11 Q. -- "with a background in 12 customer service and technical 13 troubleshooting, strong track record of 14 high impact, high pressure work and 15 except soft skills, a trusted leader 16 with the ability to execute tasks, take 17 on multiple roles, all while maintaining 18 quality results under minimal 19 supervision." You wrote that 20 description, correct? 21 A. I cannot say for sure if I 22 wrote that or if that was the statement 23 that someone wrote on my behalf and I 24 adopted it. 25 Q. Okay. And you think that</p>	<p style="text-align: right;">Page 92</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 coordinated the opening of the Torrance 3 office. It was all hands on deck. And 4 what I mean specifically is we just made 5 sure that everybody knew where to park, 6 we knew -- we all helped each other make 7 sure to know where the office was, since 8 it was in a -- a not commonly known area 9 for some, we insured that people had 10 chairs at their desk. That was pretty 11 much the extent to what I would define as 12 coordinated. 13 Q. Well, when we talk about 14 coordinated, you say here that you 15 coordinated the opening of the Campaign 16 field office in Torrance, California. 17 What did you do specifically do to 18 coordinate the opening of that office? 19 A. Like I stated before, I, along 20 -- I -- I sent out messages alongside my 21 other co-workers, to insure people knew 22 where to park, how to get in, where the 23 bathroom was, what the code was, that 24 there were chairs at tables, since there 25 wasn't, that we had shirts. And that was</p>
<p style="text-align: right;">Page 91</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 accurately describes you? 3 A. Absolutely, yes. 4 Q. So the first job that's listed 5 is the position at Genex, correct? 6 A. Correct, Genex & Mitchell, 7 correct. 8 Q. And that has you still at 9 Genex & Mitchell as of October of 2020, 10 correct? 11 A. Correct. 12 Q. Then the next job that's 13 listed is the Mike Bloomberg Campaign 14 field organizer position, correct? 15 A. Correct. 16 Q. Okay. So the first thing that 17 you say about your duties as a field 18 organizer is that you "coordinated 19 opening of Campaign field office in 20 Torrance, California." 21 What did you do to coordinate 22 the opening of the Campaign field office 23 in Torrance, California? 24 A. I insured that I, alongside 25 everybody else that was working there,</p>	<p style="text-align: right;">Page 93</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 something that me, alongside all the 3 other mem -- all the other co-workers, 4 what we were all doing. 5 Q. But -- 6 A. But this is my resumé, so... 7 Q. I'm sorry? 8 A. I'm saying this is my resumé, 9 so I'm saying in relation to me, yeah. 10 Q. Okay. Then your testimony here 11 today is that when you talk about 12 coordinating the opening of the office, 13 that you did that as part of a group 14 project? That's your testimony? 15 MS. COLE-CHU: Objection to 16 form. 17 A. Yeah, incorrect. I wouldn't 18 say it was a group project. I would say 19 that we all took on those -- we all were 20 -- we were all individually taking on -- 21 insuring that we were all able to access 22 the office. 23 Q. And when you say "all", who 24 are you talking about? 25 A. Me and my co-workers.</p>

24 (Pages 90 - 93)

<p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 Q. Which co-workers? What were</p> <p>3 their names?</p> <p>4 A. I don't recall their names but</p> <p>5 the other members -- the other people</p> <p>6 that were working at that specific</p> <p>7 office.</p> <p>8 Q. Can you recall anybody's name?</p> <p>9 A. My friend Anoosh; Delmar was</p> <p>10 our ROD, the Regional Operations</p> <p>11 Director, I think is what they referred</p> <p>12 to him as; Ann Harris. There were several</p> <p>13 other people. I don't recall their</p> <p>14 names.</p> <p>15 Q. Okay. In your resumé you go on</p> <p>16 to say "Led office in absence of Regional</p> <p>17 Organizing Director."</p> <p>18 What did you do in the absence</p> <p>19 of the Regional Organizing Director?</p> <p>20 A. I, alongside my co-workers,</p> <p>21 when we were left unsupervised, I would</p> <p>22 insure that, like I said before, the same</p> <p>23 -- the same items, to coordinate the</p> <p>24 opening of it, insure that people that</p> <p>25 came had -- were able to get into the</p>	<p>Page 94</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 office in which we were all working at.</p> <p>3 Q. How many times did you lead</p> <p>4 the office in the absence of the Regional</p> <p>5 Organizing Director?</p> <p>6 MS. COLE-CHU: Objection to</p> <p>7 form.</p> <p>8 A. I can't confirm the number.</p> <p>9 That role was shared between every single</p> <p>10 co-worker that I had. It was understood</p> <p>11 that we all -- that we all were holding</p> <p>12 that same -- those same, I don't want to</p> <p>13 say responsibilities, but it was just</p> <p>14 understood that we were all there to</p> <p>15 assist one another in insuring that we</p> <p>16 all had -- that we all had access to the</p> <p>17 facility, that we were all helping each</p> <p>18 other out and answering any questions</p> <p>19 that might have come up at any point in</p> <p>20 time when our ROD was not available.</p> <p>21 Q. Okay. And so just so I'm</p> <p>22 clear, this is a resumé that you</p> <p>23 submitted in connection with other</p> <p>24 potential jobs; is that right?</p> <p>25 MS. COLE-CHU: Objection to</p>
<p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 bathrooms, since it was a code, were able</p> <p>3 to get into the office because that was a</p> <p>4 code as well, were able to get to the</p> <p>5 office building, since we were tucked in</p> <p>6 the back, so just merely access to the</p> <p>7 office was all that I -- all that I was</p> <p>8 doing in its entirety.</p> <p>9 Q. So when you put on your resumé</p> <p>10 "led office in absence of Regional</p> <p>11 Organizing Director", you've now</p> <p>12 described to me what it was that you</p> <p>13 meant by those words?</p> <p>14 A. I did not describe what I</p> <p>15 meant, I described what I did.</p> <p>16 Q. Okay. So what did you mean by</p> <p>17 those words?</p> <p>18 MS. COLE-CHU: Objection to</p> <p>19 form.</p> <p>20 Q. It says that you led the</p> <p>21 office. How did you lead the office?</p> <p>22 A. Like I stated before, I made</p> <p>23 sure that people had access to the</p> <p>24 office, which in order to have people</p> <p>25 work they have to have access to the</p>	<p>Page 95</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 form.</p> <p>3 A. This -- I cannot confirm or</p> <p>4 deny if this is the actual resumé that I</p> <p>5 submitted to all the -- all the other</p> <p>6 potential jobs that I had.</p> <p>7 Q. Okay. We know you submitted</p> <p>8 this to at least one job; is that right?</p> <p>9 A. That's incorrect. This was</p> <p>10 sent over to my friend to look over. He,</p> <p>11 like I stated before, he was looking at</p> <p>12 my resumé and fixing it, he also did have</p> <p>13 open positions. However, that was not --</p> <p>14 there is no relationship between the two</p> <p>15 at the time this was sent over to him.</p> <p>16 Q. So by using -- by saying that</p> <p>17 you led the office, based on your</p> <p>18 testimony here today, what you meant is</p> <p>19 that you were just part of some group</p> <p>20 effort? Is that what you're telling us?</p> <p>21 MS. COLE-CHU: Objection to</p> <p>22 form.</p> <p>23 A. Yeah, that's incorrect. It was</p> <p>24 not a group effort. It was individual,</p> <p>25 an individual level of integrity that</p>

25 (Pages 94 - 97)

<p style="text-align: right;">Page 106</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 that what you're saying? 3 MS. COLE-CHU: Objection to 4 form. 5 A. I am saying that I do not feel 6 comfortable providing a statement with 7 regards to how I maintain relationships 8 with volunteers that is going to be 9 written into the court that I cannot say 10 100% for certain what it was that I did 11 to maintain that relationship. I do not 12 feel comfortable making that statement. 13 Q. Do you believe that you did 14 maintain relationships with Campaign 15 volunteers? 16 A. I do believe that I maintained 17 relationships with Campaign volunteers. 18 Q. Okay. But you can't give me an 19 example of anything that you did in that 20 regard? That's your testimony here 21 today? 22 A. Correct. I cannot tell you 23 what I did. What I know -- how I know 24 that I maintained relationships is that 25 volunteers came back several times, the</p>	<p style="text-align: right;">Page 108</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 that you were using? 3 A. That was my understanding at 4 the time that this was written, yes. 5 Q. Do you have a different 6 understanding now about what a swing 7 voter is? 8 A. A swing voter is somebody who 9 is -- I would say it's the same, it's the 10 same, but -- 11 Q. Great. 12 A. -- that could change. 13 Q. What? 14 A. That that could change at any 15 point. Like, I'm always -- I don't -- I'm 16 always learning so at that time and at 17 this time I would believe that that is 18 still true. 19 Q. That that's the definition of 20 a swing voter, is that your testimony? 21 A. That is my understanding of 22 what a swing voter is. I wouldn't say 23 that's the definition. 24 Q. Okay. So using your 25 understanding, you said that you engaged</p>
<p style="text-align: right;">Page 107</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 same volunteers came back several times 3 to do phone banking. 4 Q. And you're saying that was 5 because of whatever it was that you did? 6 A. Correct. 7 Q. Okay. And it says here "build 8 and maintain relationships with Campaign 9 volunteers to multiply and maximize 10 overall field operations." Is that what 11 you're talking about, because of the fact 12 what you did to build and maintain these 13 relationships volunteers kept coming 14 back? 15 A. It was my understanding and my 16 impression that that is correct. 17 Q. Okay. Now, you go on to say 18 "engage with thousands of California 19 swing voters." What is a swing voter? 20 A. To my understanding, a swing 21 voter is someone who is indecisive with 22 who they are going to be voting for in 23 the primary. 24 Q. And when you put "swing voter" 25 on your resumé, that is the definition</p>	<p style="text-align: right;">Page 109</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 with thousands of California swing voters 3 through telephone calls and door knocks. 4 So telephone calls, that would be phone 5 banking? 6 A. Telephone calls were through a 7 -- there were different ways of how that 8 was executed. There was this auto phone 9 and then there was also phone banking. 10 The terminology is, I would say, fluid or 11 just different things might mean the same 12 -- might seem like they mean the same 13 thing but they were different modalities 14 of how we executed phone banking. 15 So there was volunteers where 16 we would sit and call people that we were 17 given a list or with the volunteers we 18 were given a list and also there was the 19 app that we used which was automatic auto 20 phones, like, it was going automatically. 21 Q. Okay. So when you say on your 22 resumé through telephone calls, that's 23 what you were talking about, those two 24 methods? 25 A. Yeah, two methods.</p>

28 (Pages 106 - 109)

<p style="text-align: right;">Page 110</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 Q. Okay. Great. And then you say</p> <p>3 "and door knocks", what is a door knock?</p> <p>4 A. A door knock is otherwise</p> <p>5 referred to as canvassing, to my</p> <p>6 understanding, and that is when we</p> <p>7 physically go out to designated areas</p> <p>8 that we have been given by the Campaign</p> <p>9 and we knock on -- on the doors that we</p> <p>10 have been pre- -- pre-designated prior to</p> <p>11 arriving at the said neighborhood or city</p> <p>12 to door knock or to knock on those doors</p> <p>13 and speak with those individuals.</p> <p>14 Q. During the time that you</p> <p>15 worked for the Campaign, what percentage</p> <p>16 of your time did you spend doing door</p> <p>17 knocking?</p> <p>18 A. Every month, different months</p> <p>19 required different -- different levels of</p> <p>20 engagement with voters. So I would say</p> <p>21 specifically in the month of March the</p> <p>22 canvassing was about maybe 40%.</p> <p>23 Q. How about in February?</p> <p>24 A. I don't recall. So canvassing</p> <p>25 looked a couple different ways while I</p>	<p style="text-align: right;">Page 112</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 -- as a designated time in which a</p> <p>3 subject was being covered and others were</p> <p>4 asked to -- and we were invited to attend</p> <p>5 as a guest and not during work hours.</p> <p>6 Q. Did you ever speak at an event</p> <p>7 on behalf -- while you were working for</p> <p>8 the Bloomberg Campaign, in connection</p> <p>9 with your job as a field organizer?</p> <p>10 A. Not that I recall but I can't</p> <p>11 say for certain if I did or if I didn't.</p> <p>12 I would say that I don't recall doing</p> <p>13 that.</p> <p>14 Q. Okay. Looking back again at</p> <p>15 your resumé it says "engaged with</p> <p>16 thousands of California swing voters</p> <p>17 through telephone calls and door knocks</p> <p>18 designed to gauge support, inform and</p> <p>19 persuade them to support the candidate's</p> <p>20 vision for electing a new president."</p> <p>21 What do you mean by "gauge</p> <p>22 support"? How would you do that? Well,</p> <p>23 strike that. Let me ask it differently.</p> <p>24 How would you gauge support</p> <p>25 from these thousands of California swing</p>
<p style="text-align: right;">Page 111</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 was under employment with Bloomberg. One</p> <p>3 of them was door knocking, the other was</p> <p>4 attending -- like, the other was going</p> <p>5 out and handing out fliers to educate</p> <p>6 people on the streets. So in February we</p> <p>7 did more organic canvassing than we did</p> <p>8 with specified door knocking.</p> <p>9 Q. And what percentage of your</p> <p>10 time did you spend in February doing</p> <p>11 either canvassing or this organic</p> <p>12 canvassing that you described?</p> <p>13 A. I can't say for certain. It</p> <p>14 was most likely 20%, maybe 30%.</p> <p>15 Q. And the rest of the time you</p> <p>16 spent phone banking; is that your</p> <p>17 testimony?</p> <p>18 A. Correct, yes.</p> <p>19 Q. Did you attend events?</p> <p>20 A. Can you describe what you mean</p> <p>21 by an event?</p> <p>22 Q. Were there events that --</p> <p>23 well, how would you describe an "event"</p> <p>24 in the context of the Bloomberg Campaign?</p> <p>25 A. I would describe an event as a</p>	<p style="text-align: right;">Page 113</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 voters?</p> <p>3 A. When I -- "gauge" me to be</p> <p>4 able to -- "gauge" to me, I understand</p> <p>5 that word to be to not necessarily</p> <p>6 predict but be able to have a good</p> <p>7 understanding of where we're at. And so</p> <p>8 "gauge support" would mean based on the</p> <p>9 amount of people that I have come into</p> <p>10 contact with, how many of those people</p> <p>11 are going to be voting for said president</p> <p>12 at that time -- said president -- not</p> <p>13 president -- I'm sorry. Said, like,</p> <p>14 Bloomberg, for Bloomberg or candidate.</p> <p>15 Sorry.</p> <p>16 Q. So when you talk about gauging</p> <p>17 support of a particular voter, how would</p> <p>18 you figure out whether that person</p> <p>19 supported Bloomberg or not?</p> <p>20 A. They would tell us if they</p> <p>21 were voting for him or not.</p> <p>22 Q. So you would ask and they</p> <p>23 would tell you; is that right?</p> <p>24 A. Incorrect. I wouldn't</p> <p>25 necessarily ask. They would -- they would</p>

29 (Pages 110 - 113)

<p style="text-align: right;">Page 114</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 generally volunteer that information or 3 volunteer information of their disdain 4 for the candidate.</p> <p>5 Q. When you were doing door 6 knocks would you generally have apparel 7 on that would identify that you were 8 there for Mike Bloomberg?</p> <p>9 A. Correct, yes.</p> <p>10 Q. And when you did phone banking 11 you would start the conversation by 12 saying that you were calling on behalf of 13 Mike Bloomberg, correct, for the 14 Campaign?</p> <p>15 MS. COLE-CHU: Objection to 16 form.</p> <p>17 A. That's not correct. I don't 18 recall how those conversations started. I 19 -- I wouldn't say for certain that's how 20 I started the conversation off with the 21 people that we were asked to contact.</p> <p>22 Q. Well, at some point in the 23 conversation you let them know that you 24 were working for the Campaign; is that 25 right?</p>	<p style="text-align: right;">Page 116</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 A. I didn't -- I was given a 3 script and I went off that script, and 4 the script that I was given was, in my 5 opinion, very persuasive in some of the 6 talking points that it had.</p> <p>7 Q. How many talking points were 8 in the script?</p> <p>9 A. It varied. It varied because 10 it changed frequently. So I can't say for 11 certain how many because of the frequency 12 of which our scripts were changing.</p> <p>13 Q. And the talking points were 14 about the candidate's position on certain 15 issues; is that right?</p> <p>16 A. That I recall, to the best of 17 my ability, yes.</p> <p>18 Q. And just so I understand your 19 testimony here today, your testimony is 20 that when you would be persuading swing 21 voters you would just read everything on 22 the script to them? Is that your 23 testimony?</p> <p>24 A. My testimony is that I was 25 given a script, I read that script and --</p>
<p style="text-align: right;">Page 115</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 A. I'd never said I was working 3 for the Campaign. It was always we were 4 in support of the candidate.</p> <p>5 Q. Okay. It says here "designed 6 to inform." What would you do to inform 7 these thousands of California swing 8 voters about the candidate's vision for 9 electing a new president?</p> <p>10 A. We were given talking points, 11 we were given specific information to 12 share, when asked, and we were educated 13 through -- let me restate that.</p> <p>14 We were given information in 15 which we were then -- it was up to our 16 discretion to inform ourselves to then 17 inform the people that we were coming in 18 contact with as to the certain policies 19 of the candidate's -- that the candidate 20 was promoting or was expressing at that 21 time.</p> <p>22 Q. And you say here "to persuade 23 them to support the candidate's visions 24 for electing a new president." How would 25 you persuade a swing voter?</p>	<p style="text-align: right;">Page 117</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 and -- and each call that I had was -- 3 sometimes I was -- sometimes there was 4 more conversation, not pertaining to the 5 script, sometimes there was less, 6 depending on the interest of the person I 7 was on the phone with.</p> <p>8 Q. Okay. And that conversation 9 that was not pertaining to the script, 10 give me an example of what that might be?</p> <p>11 A. I -- I would not be able to 12 give you an example because it's been 13 several years and I don't have any of the 14 information that I was privy to at that 15 time nor do I recall the length of, like, 16 the details of the conversations that I 17 would have.</p> <p>18 Q. So just so I'm clear, though, 19 you wouldn't stand in front of a swing 20 voter with a piece of paper and just read 21 through the script; is that right? That's 22 not what you did --</p> <p>23 MS. COLE-CHU: Objection to 24 form.</p> <p>25 Q. -- to persuade a voter?</p>

30 (Pages 114 - 117)

<p style="text-align: right;">Page 118</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 A. I'm a bit confused. I thought 3 we were talking about the phone calls. 4 Are we now going back to the canvassing? 5 Q. Let's talk about the 6 canvassing. 7 A. Okay. 8 Q. On the canvassing -- 9 A. Okay. 10 Q. So what you did on the phone 11 was different than what you did on 12 canvassing; is that right? 13 MS. COLE-CHU: Objection to 14 form. 15 Q. I'm sorry. I didn't hear your 16 answer. 17 A. The - the scope of what we 18 were doing was always the same. The 19 method of how we were doing it differed 20 based on the method of communication that 21 we were engaging with the voters. 22 Q. What does that mean? 23 A. That means that if we were on 24 the phone we had a very specified script 25 for that. If we were in person we had a</p>	<p style="text-align: right;">Page 120</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 that time if I read from a script 3 directly in front of your face or if I was 4 going based off of the -- off of memory 5 because at different -- like, from when I 6 began to when I ended I had memorized 7 what we had to say. So I can't say for 8 certain if I was standing staring at 9 something for all of them or if I was 10 going based off of my memory. 11 Q. And when you would go either 12 off of the thing that you were just 13 reading in front of someone's face to try 14 to persuade them or going off of your 15 memory, would you talk about all of the 16 positions of the candidate or did you 17 talk about the ones that you thought were 18 important to the person you were trying 19 to persuade? 20 MS. COLE-CHU: Objection to 21 form. 22 A. I would stick to the points 23 that we were given for that specific time 24 period or that specific neighborhood, 25 depending on the information we were</p>
<p style="text-align: right;">Page 119</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 different script or talking points or 3 different information that we had on 4 hand. 5 Q. Okay. So let's talk about the 6 canvassing piece of this. 7 When you were trying to -- and 8 here you say that you successfully 9 persuaded thousands of California swing 10 voters. When you were persuading these 11 thousands of California swing voters 12 through canvassing, you didn't just stand 13 there and read down a script, did you? 14 MS. COLE-CHU: Objection to 15 form. 16 A. Yeah, I would say the 17 statement that you just made was 18 incorrect. I engaged with thousands of 19 California swing voters. I -- nowhere in 20 that statement did I state that I 21 actually succeeded in persuading all of 22 them, just that I engaged with that 23 amount of people. And also, I would say 24 that when I went and saw them in person 25 it depended on who I was engaged with at</p>	<p style="text-align: right;">Page 121</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 given to share with that specific area. 3 To the best of my knowledge, that's how 4 -- that's how I proceeded. 5 Q. So if a swing voter wasn't 6 interested in climate control, but was 7 interested in gun control, you would -- 8 if climate control was on the talking 9 points you would just read it to them 10 anyway? Is that your testimony? 11 MS. COLE-CHU: Objection to 12 form. 13 A. I just -- my testimony is that 14 I cannot recall for certain if that -- if 15 I was ever put in a position where a 16 potential swing voter was against 17 something and I read it anyways. I don't 18 believe that I did that but I can't say 19 for certain if that was done or not done. 20 Q. You said that some of the 21 people that you spoke to would express 22 disdain for the candidate. When someone 23 expressed disdain for the candidate what 24 did you do to try to persuade them to 25 support him?</p>

<p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 see this document during my employment.</p> <p>3 Q. Okay. Let's look at tab 59,</p> <p>4 Exhibit 8.</p> <p>5 (Wheatley Exhibit 8, document</p> <p>6 entitled Canvassing Toolkit, Bates</p> <p>7 MB2020_Wood_00092756 was received</p> <p>8 and marked on this date for</p> <p>9 identification.)</p> <p>10 Q. Do you recognize this as the</p> <p>11 Canvassing Toolkit?</p> <p>12 CONCIERGE: Wheatley 8 has</p> <p>13 been marked.</p> <p>14 (Deponent reviews the</p> <p>15 document.)</p> <p>16 A. Like I said before, as of</p> <p>17 November 2022 I do not recall seeing</p> <p>18 this. Not to say that I wasn't given</p> <p>19 this or did not read through this on the</p> <p>20 day -- during my employment time.</p> <p>21 Q. If you could turn to the</p> <p>22 fourth page of Exhibit 8, which is Bates</p> <p>23 00097259, does this look like a sample --</p> <p>24 does that look like a sample script that</p> <p>25 you were referring to?</p>	<p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 I'm going to do my best that the</p> <p>3 information I'm providing is accurate.</p> <p>4 And like I said before, I was given many</p> <p>5 scripts and it is possible that this was</p> <p>6 one of them but we were given many</p> <p>7 scripts in which to follow and I can't</p> <p>8 say for certain that this exact script</p> <p>9 was the one that we were given.</p> <p>10 Q. What, if anything, are you</p> <p>11 going to do to refresh your recollection</p> <p>12 so that at trial, as a class</p> <p>13 representative, you can provide more</p> <p>14 specifics as to these alleged scripts</p> <p>15 that you were given?</p> <p>16 MS. COLE-CHU: Objection to</p> <p>17 form.</p> <p>18 A. I am going to meet with my</p> <p>19 attorney and insure that I am well</p> <p>20 prepared, if I do -- if, in fact, we do</p> <p>21 end up at that point.</p> <p>22 Q. So you are going to get the</p> <p>23 information from your lawyer; is that</p> <p>24 your testimony?</p> <p>25 MS. COLE-CHU: Objection to</p>
<p>Page 131</p>	<p>Page 132</p>

<p style="text-align: right;">Page 142</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 canvassing?</p> <p>3 A. I don't recall for certain if 4 we did canvassing. I would say that I 5 don't recall doing any canvassing during 6 that time.</p> <p>7 Q. And when you worked in the 8 Torrance office did you do canvassing?</p> <p>9 A. When I worked in the Torrance 10 office I did do canvassing.</p> <p>11 Q. And is that what you consider 12 a residential area?</p> <p>13 A. The office in Torrance was not 14 a res -- I'm sorry. The office in 15 Torrance was not a residential area, it 16 was an office complex, an office, like, 17 offices. The canvassing that we did 18 required us to -- it was a destination. 19 But it was when I went to the Torrance 20 office that that occurred.</p> <p>21 Q. Okay. So in the Torrance 22 office you would get sent out to a 23 residential area to do canvassing; is 24 that right?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 144</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 Q. Okay. And if you went as a 3 group you would go to a location as a 4 group and then split up, you wouldn't go 5 as a group house to house, right?</p> <p>6 A. That is correct.</p> <p>7 MS. BLOOM: Can we show the 8 witness what is under tab 58 and 9 mark it as Exhibit 9, please?</p> <p>10 (Wheatley Exhibit 9, document 11 entitled Voter Contact Script, 12 Bates MB2020_Wood_00042524 was 13 received and marked on this date 14 for identification.)</p> <p>15 CONCIERGE: Wheatley 9 has 16 been marked.</p> <p>17 Q. Do you recognize this 18 document?</p> <p>19 A. Can you repeat the question?</p> <p>20 I'm sorry.</p> <p>21 MS. COLE-CHU: I was having 22 trouble hearing you.</p> <p>23 MS. BLOOM: I'm sorry. I 24 missed both of that. My question 25 was whether she recognized the</p>
<p style="text-align: right;">Page 143</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 Q. And you would actually go to 3 people's homes; is that right?</p> <p>4 A. That is correct.</p> <p>5 Q. And did you go with anybody 6 else?</p> <p>7 A. Generally, that varied. 8 Sometimes I did, sometimes I did not.</p> <p>9 Q. And what determined whether 10 you went with somebody else or not?</p> <p>11 A. Different variables. Just 12 depended on the group. Sometimes we did 13 it together so that we could get more 14 stuff done, sometimes we did it -- 15 sometimes we ran into each other because 16 we were doing neighborhoods and it also 17 depended on the -- our ROD, what our ROD 18 had us doing. So he would tell us if we 19 were going by ourselves or we were going 20 with other individuals. And sometimes --</p> <p>21 Q. And different RODs -- go 22 ahead. I'm sorry.</p> <p>23 A. I was going to say, and 24 sometimes it also was with volunteers 25 too. Just every day was different.</p>	<p style="text-align: right;">Page 145</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 document.</p> <p>3 A. Yeah. This one I recognize.</p> <p>4 Q. And what is this?</p> <p>5 A. This is one of the scripts we 6 were given at some point during my 7 employment.</p> <p>8 Q. So in looking at Exhibit 9 it 9 says, "If undecided, what issues are most 10 important to you in this election? 11 Actively listen to the voter." Would you 12 do that, ask an undecided voter what 13 issues are most important to you in this 14 election?</p> <p>15 A. I did. And like I stated 16 before when we were going over my resumé, 17 I did that.</p> <p>18 Q. Okay. Good. And would you 19 actively listen to the answer?</p> <p>20 A. I would, yes.</p> <p>21 Q. Because the answer was 22 important, right?</p> <p>23 A. The answer was necessary in 24 order to understand how to proceed.</p> <p>25 Q. And then it says, "As someone</p>

<p style="text-align: right;">Page 146</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 who also cares about this issue because" 3 -- and it says -- "personal reason." I 4 hear your concern, I am supporting Mike 5 because" and it says, "Share personal 6 story or use talking points below." 7 Focusing on the first 8 sentence, "As someone who also cares 9 about this issue because", and put in a 10 personal reason, did you do that? 11 A. To the best of my 12 recollection, I would state that I 13 believe that I did, yes. 14 Q. Then it says, "Go on, I hear 15 your concerns, I'm supporting Mike 16 because", and you can share your personal 17 story or use the talking points. Did you 18 share your personal story? 19 A. It depended on the issues that 20 the voter had expressed and it depended 21 on if I had any relationship to the 22 issues that were being expressed. 23 MS. BLOOM: Okay. Thank you. 24 Can we look at tab 71, please and 25 mark that as Exhibit 10? And this</p>	<p style="text-align: right;">Page 148</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 employed. 3 Q. And why were you doing that? 4 A. I was asked to by the company 5 that -- or I was asked to by my employer 6 and I also -- yeah, I was asked to by my 7 employer. 8 Q. When you say -- what were you 9 asked to do by your employer? 10 A. I was asked to -- I was asked 11 to inform people about a position that 12 was opened at the -- at the company. 13 Q. And when you say "the 14 company", you mean the Campaign? 15 A. The Campaign yes. 16 Q. And other than Erin Moses, did 17 you inform anybody else about open 18 positions at the Campaign? 19 A. I did. And you can see below 20 it was to Brianna Garza and Maya Jackson 21 and John Scott. 22 Q. Were those also friends of 23 yours? 24 A. I don't recall who exactly 25 John is, but Maya and Brianna Garza were</p>
<p style="text-align: right;">Page 147</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 is Bates P007619 to P007624. 3 (Wheatley Exhibit 10, email 4 dated January 30, 2020, Bates 5 P007619 was received and marked on 6 this date for identification.) 7 CONCIERGE: Wheatley 10 has 8 been marked. 9 Q. Ms. Wheatley, these are 10 documents that you provided in the course 11 of discovery. Do you recognize them? 12 A. Do I recognize this email? 13 Yes, I do. 14 Q. Okay. And you were -- well, 15 first of all, who is Erin Moses? 16 A. Erin Moses is my friend. 17 Q. And were you helping Erin 18 Moses apply for a position as Deputy 19 Field Officer for the Campaign? 20 MS. COLE-CHU: Objection to 21 form. 22 A. I was not helping her get a 23 job. I was simply forwarding over 24 information on a job, about a job where I 25 was working, where I was currently</p>	<p style="text-align: right;">Page 149</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 friends of mine, yes. 3 Q. And did any of them actually 4 come and work for the Campaign? 5 A. I believe that Brianna was 6 interviewed. I don't believe that she was 7 hired. 8 Q. And it says, "Our deputy 9 organizers will work 20 to 25 hours per 10 week with a flexible work schedule." Do 11 you see that? 12 A. I do see that. 13 Q. So for the position that you 14 were informing these people about, was a 15 position for 20 to 25 hours a week with a 16 flexible work schedule; is that correct? 17 A. That is what the statement is 18 and that was my understanding at the time 19 that I sent this, that I forwarded this 20 email over to those individuals. 21 Q. And you were never a deputy 22 organizer; is that right? 23 A. That is correct. 24 Q. In terms of the hours -- and 25 you can take that down.</p>

<p style="text-align: right;">Page 150</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 In terms of the hours that you</p> <p>3 devoted, that you spent on the Campaign</p> <p>4 when you were working as a field</p> <p>5 organizer in the month of January, how</p> <p>6 many hours a week did you work for the</p> <p>7 Campaign?</p> <p>8 A. In January I worked every day.</p> <p>9 I'd have to sit with a calculator to</p> <p>10 measure the time but it was well over</p> <p>11 right away 40 hours. I worked all day</p> <p>12 Saturday and Sunday and I worked</p> <p>13 generally between 10 to 12 Monday through</p> <p>14 Friday ending at about 9:00.</p> <p>15 Q. I'm sorry. You said you worked</p> <p>16 between 10 to 12 Monday through Friday?</p> <p>17 A. I usually got to the office</p> <p>18 when the office opened. The opening of</p> <p>19 the office varied, so that some days it</p> <p>20 was 10, 11 or 12. It just depended on</p> <p>21 when the office opened, it depended on if</p> <p>22 we had a meeting that day and it depended</p> <p>23 on my job -- my other job as well. So it</p> <p>24 was generally between 10 and 12 that I</p> <p>25 got to the office.</p>	<p style="text-align: right;">Page 152</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 the Campaign in January?</p> <p>3 A. In the month of January when I</p> <p>4 was hired, from when I was hired I did</p> <p>5 work those weekends. And if I -- I'd have</p> <p>6 to look at a calendar to see for sure</p> <p>7 what weekends those were and when I</p> <p>8 actually began, because that is something</p> <p>9 that I don't necessarily recall the exact</p> <p>10 date, so...</p> <p>11 Q. And there were some weekends</p> <p>12 that you couldn't work because of your</p> <p>13 other job, correct?</p> <p>14 MS. COLE-CHU: Objection to</p> <p>15 form.</p> <p>16 A. That's not correct. I did not</p> <p>17 ever not work a weekend.</p> <p>18 Q. Could you ever not work a</p> <p>19 weekend day, meaning Saturday or Sunday,</p> <p>20 when you worked for the Campaign?</p> <p>21 A. No, I worked every Saturday</p> <p>22 and Sunday for the Campaign.</p> <p>23 Q. Okay. In February and March</p> <p>24 also?</p> <p>25 A. Correct, yeah.</p>
<p style="text-align: right;">Page 151</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 Q. Okay. And how many hours in</p> <p>3 January per week were you working for</p> <p>4 your other job?</p> <p>5 A. I cannot say for certain the</p> <p>6 amount of hours but anywhere between -- I</p> <p>7 cannot -- I couldn't say for certain on</p> <p>8 the record the amount of hours.</p> <p>9 Q. Well, approximately how many?</p> <p>10 A. Maybe, approximately, like, 30</p> <p>11 hours, 35.</p> <p>12 Q. 35 hours a week?</p> <p>13 A. Approximately.</p> <p>14 Q. And how many hours a week for</p> <p>15 the Campaign during that time?</p> <p>16 A. Like I said, if I got there to</p> <p>17 the office between 10 and 11 --</p> <p>18 generally, it was between 11 or 12 and</p> <p>19 then I would leave around 9, 8, 9,</p> <p>20 sometimes 10, depending on the day. Like</p> <p>21 Fridays and then on weekends it was</p> <p>22 typically in the morning all the way to</p> <p>23 the nighttime on Saturday and Sunday.</p> <p>24 Q. And it's your testimony that</p> <p>25 you worked every Saturday and Sunday for</p>	<p style="text-align: right;">Page 153</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 Q. Okay. And it's your testimony</p> <p>3 here today that you never, during the</p> <p>4 entire time you worked for the Campaign,</p> <p>5 you worked every single Saturday and</p> <p>6 Sunday?</p> <p>7 A. To the best of my knowledge,</p> <p>8 that is true, that I remember, and that I</p> <p>9 recall. I do not recall ever not working</p> <p>10 those weekends and I'm also uncertain of</p> <p>11 when we stopped working in March. So</p> <p>12 depending on when the last day was in</p> <p>13 March and when the first day was that I</p> <p>14 started working in January, and to the</p> <p>15 best of my knowledge, I recall working</p> <p>16 all those weekends.</p> <p>17 Q. In the month of February how</p> <p>18 many hours a week did you work for the</p> <p>19 Campaign?</p> <p>20 A. It was the same that I worked</p> <p>21 in January. I'd have to get a calculator</p> <p>22 to calculate the amount of time but, like</p> <p>23 I said, if we were on the latter side,</p> <p>24 between 12 every day, you know, 10 --</p> <p>25 generally between 12, leaving the office</p>

<p style="text-align: right;">Page 154</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 at 8 or 9 or 10, depending on the day, 3 and depending the responsibilities on 4 hand Monday through Friday and on 5 weekends, arriving at the office early, 6 early -- generally early mornings until 7 the end of the day or depending on the 8 activities that we were doing that day. 9 So it all fluctuated -- 10 Q. And how many hours -- and how 11 did the activities that you were doing 12 impact your hours? 13 MS. COLE-CHU: I don't believe 14 the witness is done with her answer 15 to the last question. 16 A. Yeah. It fluctuated is my 17 statement, was my last statement. 18 Q. How did the activities impact 19 your hours? 20 A. If we were asked to go to a 21 flea market that began at 7 a.m., then we 22 were asked to show up at the flea market 23 when it began. If we were -- so it just 24 depended on what we were asked to do that 25 day.</p>	<p style="text-align: right;">Page 156</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 A. I cannot say for certain. 3 MS. COLE-CHU: Objection to 4 form. 5 Q. And in March, how many hours a 6 week did you work for Genex? 7 A. I would say it was the same 8 amount. 9 Q. And for the Campaign? 10 A. It was -- I can't say for 11 certain because I don't recall, like, 12 when things ended or, like, when the 13 company -- when we stopped being 14 employed, but it was -- there was 15 definitely an increase in how much we 16 were working in March. 17 Q. And you still were working 18 your 35 hours a week for Genex? 19 A. That I recall, that is 20 correct. 21 MS. BLOOM: If we can show the 22 witness what's under tab 72 and 23 mark it as Exhibit 11? It's 24 P008132. 25 (Wheatley Exhibit 11, email)</p>
<p style="text-align: right;">Page 155</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 Q. And in the month of February, 3 how many hours a week did you work for 4 Genex? 5 A. I would say it was the same. I 6 can't -- I can't state for certain the 7 amount of hours. 8 Q. So about 35 hours a week, is 9 that your testimony? 10 A. That's my testimony. 11 Q. And when you were working for 12 Genex, did you ever do any of that work 13 when you were at the Bloomberg Campaign? 14 A. There were instances where I 15 was allowed to come to the office to -- 16 and I was allowed to work my other job so 17 I could immediately start working the 18 Bloomberg job at a specified time. 19 Q. And do you have any records of 20 that? 21 A. That was just a verbal 22 agreement given by my ROD and me. 23 Q. And I assume that Genex would 24 have records of the hours that you worked 25 and how much you were paid, correct?</p>	<p style="text-align: right;">Page 157</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 dated January 30, 2020, Bates 3 P008132 was received and marked on 4 this date for identification.) 5 CONCIERGE: Wheatley will 11 6 has been marked. 7 Q. Do you recognize this as an 8 email from you to Anoosh on January 30th, 9 2020? 10 A. That is correct. I do 11 recognize it is. 12 Q. And Anoosh is your friend; is 13 that right? 14 A. He was a friend of mine, yes. 15 Q. And here he's talking about 16 being interested in coming to work for 17 the Bloomberg Campaign; is that right? 18 A. He is, yeah. He is, yup. 19 Q. And did he eventually work for 20 the Campaign? 21 A. He did. 22 Q. It says here, "I was referred 23 my friend Alex Wheatley who I witnessed 24 in just a short time how much she enjoys 25 working for the Bloomberg Campaign." Is</p>

<p style="text-align: right;">Page 218</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 A. I do.</p> <p>3 Q. What does that mean? What does</p> <p>4 that mean?</p> <p>5 A. I don't recall the contents of</p> <p>6 why she stated that subject line at that</p> <p>7 time but just I would assume -- I don't</p> <p>8 want to assume. I would just say I'm not</p> <p>9 sure what the purpose of her writing that</p> <p>10 subject was, other than that's the</p> <p>11 subject that she chose.</p> <p>12 Q. Did she send you these</p> <p>13 documents that are attached here?</p> <p>14 MS. COLE-CHU: Objection to</p> <p>15 the form.</p> <p>16 A. It appears that she did.</p> <p>17 Q. And why was she sending you</p> <p>18 these documents on August 26th of 2020?</p> <p>19 A. I can't recall why she sent</p> <p>20 them over to me, just that she did.</p> <p>21 MS. BLOOM: You can take it</p> <p>22 down.</p> <p>23 Q. When you were working for the</p> <p>24 Campaign and you said that you would</p> <p>25 either work in the office or you would be</p>	<p style="text-align: right;">Page 220</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 when you were canvassing?</p> <p>3 A. Usually I brought my own lunch</p> <p>4 or we would on our way back to the office</p> <p>5 stop to grab something to go. I don't</p> <p>6 recall there ever being a time where we</p> <p>7 actually stopped to sit down at, like, a</p> <p>8 restaurant to have dinner or lunch or</p> <p>9 breakfast.</p> <p>10 Q. So did anyone tell you that</p> <p>11 you couldn't take a lunch break?</p> <p>12 A. It was never verbalized that</p> <p>13 we could or that we couldn't verbally or</p> <p>14 -- I don't recall, like, somebody calling</p> <p>15 us and saying to take a lunch break or</p> <p>16 take a dinner break.</p> <p>17 Q. How about somebody -- did</p> <p>18 anybody say that you couldn't?</p> <p>19 A. No one said we could, no one</p> <p>20 said we couldn't. But it was definitely</p> <p>21 -- we were definitely made aware of when</p> <p>22 we weren't working and they could see</p> <p>23 that because they were tracking what we</p> <p>24 were doing and when we were doing it.</p> <p>25 Q. When you say they were</p>
<p style="text-align: right;">Page 219</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 out canvassing; is that right?</p> <p>3 A. When I worked for the</p> <p>4 Campaign, I was -- every day</p> <p>5 differentiated, so I can't say for</p> <p>6 certain if what I did on a daily basis</p> <p>7 was limited to those two references.</p> <p>8 Q. But you could also be working</p> <p>9 at an event; is that right?</p> <p>10 A. I was -- I was asked to work</p> <p>11 events, not...</p> <p>12 Q. Okay. I'm sorry?</p> <p>13 A. No. That's it.</p> <p>14 Q. Besides working in the office,</p> <p>15 canvassing and working events, what else</p> <p>16 did you do?</p> <p>17 A. That I recall, I think it's</p> <p>18 limited to those three avenues.</p> <p>19 Q. Okay. Now, when you were out</p> <p>20 canvassing you didn't have a supervisor</p> <p>21 with you, did you?</p> <p>22 A. It depended on where we were</p> <p>23 canvassing. Sometimes we did and</p> <p>24 sometimes we didn't.</p> <p>25 Q. What would you do for lunch</p>	<p style="text-align: right;">Page 221</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 tracking, did they track the number, when</p> <p>3 you were canvassing, the number of doors</p> <p>4 that you called on?</p> <p>5 A. Yes.</p> <p>6 Q. And did you have a number that</p> <p>7 you were supposed to reach?</p> <p>8 A. We didn't have a particular</p> <p>9 number but we were given a list of places</p> <p>10 that we needed to go and I wouldn't -- I</p> <p>11 don't know the number and I wouldn't --</p> <p>12 it was just a list and we had to go to</p> <p>13 those places on the list.</p> <p>14 Q. And you said sometimes</p> <p>15 volunteers went with you; is that right?</p> <p>16 A. I think there was one occasion</p> <p>17 that volunteers -- a couple of occasions,</p> <p>18 more than two maybe, that volunteers came</p> <p>19 with us, correct.</p> <p>20 Q. And then when you got to the</p> <p>21 canvassing place you would split up,</p> <p>22 you'd split up the list; is that right,</p> <p>23 with whoever was with you? If you were</p> <p>24 going as a group or individually, you</p> <p>25 would split up the list because one</p>

<p style="text-align: right;">Page 222</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 person would go to each door; is that 3 right? 4 A. When I was with volunteers 5 generally it would be me with the 6 volunteers doing it together. And we were 7 all given our own list. So that's not 8 accurate. Like, I was given a list and 9 Jane Doe was given a list and we might do 10 that list together but we were doing both 11 lists and that was very rare that that 12 occurred. 13 Q. What happened when you 14 finished that list? 15 A. We would go back to the office 16 to continue phone banking. 17 Q. But when you were done with 18 the list you were done with the list, 19 right? 20 A. It depended on the day. 21 Sometimes you were asked to -- sometimes 22 mid-canvassing we were given another list 23 and it was just based on -- I'm not sure 24 exactly what it was based on but it was 25 my limited understanding that it was</p>	<p style="text-align: right;">Page 224</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 could they leave? 3 MS. COLE-CHU: Objection to 4 form. 5 A. I -- I'm not at liberty to say 6 that. I'm not -- I didn't see that occur 7 so I can't say if that's true or not. 8 Q. If you had to go to the 9 bathroom, could you get up and go to the 10 bathroom? 11 A. It felt as though we couldn't 12 but of course, we did anyways. 13 Q. If you wanted to go get a cup 14 of coffee, could you go get a cup of 15 coffee? 16 A. There were instances where I 17 would be on the phone grabbing a cup of 18 coffee or sending a text message, 19 grabbing a cup of coffee. So there was 20 never a time where I was grabbing a cup 21 of coffee and not simultaneously on the 22 phone. 23 Q. Was that your choice? 24 MS. COLE-CHU: Objection to 25 form.</p>
<p style="text-align: right;">Page 223</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 based on how many doors we actually were 3 able to knock on. So if we -- yeah. 4 Q. When you worked in the office 5 you had a designated lunch break every 6 day; isn't that right? 7 MS. COLE-CHU: Objection to 8 form. 9 A. That was not my understanding. 10 Q. There was a time -- you were 11 allowed to take breaks when you worked in 12 the office; isn't that right? 13 MS. COLE-CHU: Objection to 14 form. 15 A. That was not my understanding 16 either. 17 Q. What was your understanding? 18 A. That we were there to work and 19 that we needed to hit the numbers that 20 they had asked us to hit. 21 Q. And once you hit those numbers 22 could you leave? 23 A. The numbers were unattainable, 24 so no. 25 Q. Well, if one could attain them</p>	<p style="text-align: right;">Page 225</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 A. I felt as though that was the 3 only choice. 4 Q. Because of what your numbers 5 were, is that why? 6 A. Because of the environment, 7 because of the leadership and because of 8 the pressure that we were under. 9 Q. Did anybody ever tell you that 10 you couldn't take a break during the 11 workday? 12 A. I don't recall if that 13 statement was ever made by anybody. 14 Q. Did you ever consider quitting 15 the job at the Campaign? 16 A. I don't recall the sentiment 17 that I felt during that time. I was very 18 -- I do know that I was very passionate 19 and very motivated to keep going. 20 Q. Did you bring your lunch -- 21 oh, passionate about the candidate? 22 A. About the position that I was 23 working in, I really enjoyed -- I really 24 enjoyed what I was doing. I was learning 25 something, yeah.</p>

<p style="text-align: right;">Page 238</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 Q. What was your hourly rate at</p> <p>3 the insurance company during the time</p> <p>4 that you were working for the Campaign?</p> <p>5 A. I don't even recall how much I</p> <p>6 was being paid at that time. That was</p> <p>7 years ago. I don't recall for certain the</p> <p>8 hourly rate. But the hourly rate versus</p> <p>9 the hours versus the statement I think</p> <p>10 are two different subject matters.</p> <p>11 Q. How did what you were earning</p> <p>12 at the insurance company compare to what</p> <p>13 the Campaign was paying you?</p> <p>14 A. When you say "compare", what</p> <p>15 do you --</p> <p>16 Q. Was it more or less? Was it</p> <p>17 more or less? Your compensation at the</p> <p>18 insurance company right before you</p> <p>19 started work at the Campaign, was it more</p> <p>20 or less than what the Campaign was paying</p> <p>21 you?</p> <p>22 A. It was less.</p> <p>23 Q. And after the Campaign ended</p> <p>24 you went back to work at the insurance</p> <p>25 company or you resumed your hours at the</p>	<p style="text-align: right;">Page 240</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 have been working 100 hours a week?</p> <p>3 A. I cannot make that testimony,</p> <p>4 nor do I feel confident in making that</p> <p>5 statement. I would just simply say that I</p> <p>6 worked approximately a certain amount of</p> <p>7 hours at the -- at Genex and I worked a</p> <p>8 significant amount more at the Campaign</p> <p>9 working every single day up until I was</p> <p>10 let go.</p> <p>11 Q. And sitting here today, can</p> <p>12 you tell me if there was any overlap in</p> <p>13 the hours, meaning that you were working</p> <p>14 for both entities at the same time?</p> <p>15 A. I cannot recall during that</p> <p>16 timeframe if that occurred or not.</p> <p>17 Q. If that did occur, then you</p> <p>18 would have been getting paid from both of</p> <p>19 them simultaneously?</p> <p>20 MS. COLE-CHU: Objection.</p> <p>21 A. I cannot -- I cannot -- I -- I</p> <p>22 don't -- I don't believe that that's a</p> <p>23 fair -- I don't believe that that</p> <p>24 statement is accurate because I was not</p> <p>25 being paid hourly from the Campaign. I</p>
<p style="text-align: right;">Page 239</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 insurance company, correct?</p> <p>3 A. Correct.</p> <p>4 Q. If you look at the next page</p> <p>5 in paragraph 96, it says that you</p> <p>6 regularly worked approximately 65 hours a</p> <p>7 week for the Campaign. Is that a true</p> <p>8 statement?</p> <p>9 A. It is a true statement of</p> <p>10 which varied based on the week. That's</p> <p>11 why the word "approximately" is</p> <p>12 important.</p> <p>13 Q. What was the range?</p> <p>14 A. It could have been 50, could</p> <p>15 have been 65, could have been 70,</p> <p>16 honestly. That's why the word</p> <p>17 "approximately" I think is really</p> <p>18 important in that statement because it</p> <p>19 was around that amount of hours.</p> <p>20 Q. Was it ever less than 40?</p> <p>21 A. No.</p> <p>22 Q. So assuming it was 65 hours a</p> <p>23 week, and that you were working 35 hours</p> <p>24 a week for the insurance company, is it</p> <p>25 your testimony here today that you would</p>	<p style="text-align: right;">Page 241</p> <p>1 ALEXANDRA WHEATLEY-DIAZ</p> <p>2 was given a set amount to work a set</p> <p>3 amount of hours that should not have</p> <p>4 exceeded a certain amount of hours and</p> <p>5 did. So I would disagree with that</p> <p>6 statement because I don't think it's</p> <p>7 valid.</p> <p>8 Q. Okay. So if you were working</p> <p>9 for Genex and you were working for the</p> <p>10 Campaign at the same time, meaning you</p> <p>11 were charging both of them for your</p> <p>12 hours, would you not count that as an</p> <p>13 hour worked for the Campaign because you</p> <p>14 were on salary? Is that what you're</p> <p>15 saying?</p> <p>16 MS. COLE-CHU: Objection to</p> <p>17 form.</p> <p>18 A. I'm not saying that at all.</p> <p>19 I'm simply saying that the Campaign was</p> <p>20 paying me to work a certain amount of</p> <p>21 hours of which were exceeded and my job</p> <p>22 with Genex was paying me to work a</p> <p>23 certain -- to do certain tasks which I</p> <p>24 was doing as well. So I don't think that</p> <p>25 the statement that you're making is --</p>

<p style="text-align: right;">Page 246</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 back on the record. The time is 3 12:33 p.m. 4 EXAMINATION BY MS. COLE-CHU: 5 Q. Ms. Wheatley, what were your 6 primary job duties as a field organizer 7 for the Mike Bloomberg Campaign? 8 A. My primary duties were to 9 canvass when asked and to phone bank and 10 to work events when necessary. 11 Q. So looking specifically at 12 canvassing and phone banking, what 13 percentage of your overall job duties, 14 while employed by the Mike Bloomberg 15 Campaign as a field organizer, were you 16 canvassing and phone banking? 17 A. It depended on the month but 18 in the month of January and February we 19 were primarily phone banking, with the 20 occasional canvassing at a rate of about 21 20%. When March hit we were approximately 22 -- it was pretty 50/50, like half the day 23 would be, depending on the day, 24 canvassing and the other half would be 25 phone banking. Some days it would</p>	<p style="text-align: right;">Page 248</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 subject is Alex Events For February. Do 3 you remember the events of this email? 4 A. I remember discussing this 5 email with Jonathan or with you guys? 6 Q. Do you remember discussing 7 this email today? 8 A. Yes, I do remember discussing 9 this email today. 10 Q. I would just like to go 11 through some of these events with you. 12 In the first line there is an 13 event -- well, I'll read the line. It 14 says, "Friday, January 31st" it says, 15 "Hosting event for outvote in Long 16 Beach." Did that occur? 17 A. It did not. 18 Q. There is another event and you 19 say, "Saturday February 1st, yoga on the 20 roof attending or just going to Equinox 21 and calling all day if I have addresses. 22 I will attend this as well." Did you 23 attend that event? 24 A. I did not. 25 Q. In the third paragraph down</p>
<p style="text-align: right;">Page 247</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 primarily just be phone banking. And 3 when I say phone banking I also mean text 4 messages and the auto-dial. 5 Q. When you look at those job 6 duties combined, canvassing and phone 7 banking, as a percentage of your overall 8 job duties while working for the 9 Campaign, what percentage of your overall 10 job duties were canvassing and phone 11 banking? 12 A. I would say 98% of it. 13 Q. We looked at an email. Do you 14 mind pulling up Exhibit 12 and taking a 15 look at that with me? 16 A. Oh, yes. 17 MS. BLOOM: Can you put it on 18 the screen, please? Could the 19 Concierge put that on the screen? 20 Thanks. 21 Q. Do you have the exhibit in 22 front of you, Ms. Wheatley? 23 A. I do. 24 Q. This is Exhibit 12, an email 25 sent by you to Jonathan Salvador and the</p>	<p style="text-align: right;">Page 249</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 there is some underlined text reading, 3 "Equinox attending in South Bay as they 4 asked me to come back. This is where I go 5 to the gym, I'll also be there Friday and 6 every day in the morning." Did you 7 attend that event? 8 A. I would not signify that as an 9 event but I did drop off information on 10 the Campaign to them and when I went to 11 the gym I brought information and I 12 dropped that off to them because I was 13 allowed to. So, yeah. 14 Q. How many times did you do 15 that? 16 A. I believe I only actually did 17 it once. 18 Q. Looking at the next paragraph 19 down it reads, "Thursday February 6th: 20 All district meeting at 6:30 meeting at 21 Manhattan Beach." Was this an event in 22 connection with your work with the 23 Bloomberg Campaign? 24 A. It was not. 25 Q. Looking at the next paragraph</p>

<p style="text-align: right;">Page 250</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 down it reads "Saturday South Bay Lunar 3 Festival at 6:30 p.m." Did you attend 4 that event? 5 A. I did not. 6 Q. The next line down it reads, 7 "February 9th: Hosting a Valentines day 8 party for outvote." Is that an event that 9 you attended on behalf of the Mike 10 Bloomberg Campaign? 11 A. To my -- yeah, no, I not 12 recall attending that event. 13 Q. Further down in the email you 14 state, "February 1st at night and 15 February 28th at night hosting this event 16 at 7 p.m." Do you remember giving 17 testimony on this earlier today? 18 A. I do. 19 Q. Did you attend events in 20 connection with your work with the 21 Bloomberg Campaign on either of these 22 nights? 23 A. I cannot recall specifically 24 if it was those two dates but it is -- 25 it's possible.</p>	<p style="text-align: right;">Page 252</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 events identified here in this email? 3 A. No. 4 Q. Looking down towards the 5 bottom of the email you wrote, "February 6 15th, Torrance Farmers Market attending 7 all morning." Do you recall if you went 8 to the Torrance Farmers Market on 9 February 15th? 10 A. I do not recall going to the 11 Torrance Farmers Market. I did go to the 12 Torrance Flea Market, which are two 13 different things but I cannot say it was 14 on February 15th. 15 Q. Did you ever go to an event at 16 the Torrance Farmer's Market on behalf of 17 the Bloomberg Campaign at any point? 18 A. I do not believe I went to the 19 Torrance Farmer's Market on behalf of the 20 Bloomberg Campaign at any point. 21 Q. Further down in the email you 22 wrote, "Feb 29th, girls on the run in the 23 South Bay/Get a Clue event later that 24 night, pillow park." Do you know what 25 event that's referring to?</p>
<p style="text-align: right;">Page 251</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 Q. Next line down -- well, let me 3 ask about those events. Do you recall 4 what those events were? 5 A. I don't. I do not. 6 Q. And is your testimony that you 7 don't remember either way whether you 8 attended? 9 A. That is correct. That's my 10 testimony. 11 Q. Do you know whether they 12 happened? 13 A. I don't know whether they 14 happened and I certainly do not know if I 15 attended. Based on my experience with 16 this email, in particular, none of the 17 events -- these two events specifically 18 would -- probably would, to the best of 19 my understanding and recollection, fall 20 under the category of providing 21 information that Jonathan requested, not 22 actually having any validity to the 23 statement in which I wrote. 24 Q. Did you do anything beyond 25 writing this email to plan any of the</p>	<p style="text-align: right;">Page 253</p> <p>1 ALEXANDRA WHEATLEY-DIAZ 2 A. I do not. I do not recall that 3 event. 4 Q. Did you attend that event? 5 A. I do not recall if I attended 6 that event or that it actually ever 7 happened, yeah. 8 Q. Did you ever host a game night 9 outvote party in connection with your 10 employment with the Bloomberg Campaign? 11 A. I believe it was my intention 12 but it never actually occurred. 13 Q. Did you attend a blood drive 14 on February 10th in Manhattan Beach in 15 connection with your work on the 16 Bloomberg Campaign? 17 A. I did not. 18 Q. Were you involved in the 19 planning of any events in connection with 20 your work as a field organizer for the 21 Bloomberg Campaign? 22 A. I was not. In regards to 23 planning, I was not. 24 MS. COLE-CHU: Those are my 25 only questions.</p>

<p style="text-align: right;">Page 254</p> <p>1 MS. BLOOM: Thank you. Subject 2 to the supplemental discovery. 3 VIDEOGRAPHER: Anything 4 further before I take us off the 5 record for today? 6 MS. COLE-CHU: We can go off. 7 VIDEOGRAPHER: All right. We 8 are going off the record at 12:42 9 p.m. and this includes today's 10 testimony given by Alexandra 11 Wheatley-Diaz. 12 The total number of Media 13 Units used was 5 and will be 14 retained by Veritext Legal 15 Solutions. 16 (The proceedings were 17 adjourned at 12:42 p.m. PST) 18 19 20 21 22 23 24 25</p>	<p style="text-align: right;">Page 256</p> <p>1 I N D E X 2 WITNESS: ALEXANDRA WHEATLEY-DIAZ 6 3 DIRECT EXAMINATION BY MS. BLOOM 6 4 EXAMINATION BY MS. COLE-CHU 246 5 6 E X H I B I T S 7 Wheatley Exhibit 1, email 23 8 forwarding resumé of Alexandra 9 Wheatley-Diaz, Bates P007635 10 Wheatley Exhibit 2, email dated 45 11 January 16, 2020, Bates P008641 12 Wheatley Exhibit 3, letter dated 76 13 October 19, 2020 from Outten & 14 Golden 15 Wheatley Exhibit 4, email dated 86 16 October 6, 2020, Bates P007945 17 Wheatley Exhibit 5, email 124 18 forwarding resumé dated 19 September 14, 2020, Bates 20 P007951 21 Wheatley Exhibit 6, document 127 22 entitled Introductory 23 One-on-one, Bates 24 MB2020_Wood_00036509 25 Wheatley Exhibit 7, document 129</p>
<p style="text-align: right;">Page 255</p> <p>1 C E R T I F I C A T E 2 I, MAUREEN M. RATTO, a 3 Registered Professional Reporter, do 4 hereby certify that prior to the 5 commencement of the examination, 6 ALEXANDRA WHEATLEY-DIAZ was sworn by me 7 to testify the truth, the whole truth 8 and nothing but the truth. 9 I DO FURTHER CERTIFY that the 10 foregoing is a true and accurate 11 transcript of the proceedings as taken 12 stenographically by and before me at 13 the time, place and on the date 14 hereinbefore set forth. 15 I DO FURTHER CERTIFY that I am 16 neither a relative nor employee nor 17 attorney nor counsel of any of the 18 parties to this action, and that I am 19 neither a relative nor employee of such 20 attorney or counsel, and that I am not 21 financially interested in this action. 22 23 24  MAUREEN M. RATTO, RPR 25 License No. 817125</p>	<p style="text-align: right;">Page 257</p> <p>1 entitled Volunteer Retention, 2 Bates MB2020_Wood_00097259 3 Wheatley Exhibit 8, document 130 4 entitled Canvassing Toolkit, 5 Bates MB2020_Wood_00092756 6 Wheatley Exhibit 9, document 144 7 entitled Voter Contact Script, 8 Bates MB2020_Wood_00042524 9 Wheatley Exhibit 10, email dated 147 10 January 30, 2020, Bates P007619 11 Wheatley Exhibit 11, email dated 156 12 January 30, 2020, Bates P008132 13 Wheatley Exhibit 12, email dated 162 14 January 30, 2020, Bates 15 MB2020_Wood_00090165 16 Wheatley Exhibit 13, email dated 167 17 February 7, 2020, Bates 18 MB2020_Wood_00090101 19 Wheatley Exhibit 14, email dated 170 20 February 7, 2020, Bates 21 MB2020_Wood_00091049 22 Wheatley Exhibit 15, email dated 177 23 February 6, 2020, Bates 24 MB2020_Wood_90133, 25 Wheatley Exhibit 16, pay 180</p>

65 (Pages 254 - 257)

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